

United States District Court
Western District of Washington

Honorable Richard A. Jones

COURT'S GENERAL VOIR DIRE QUESTIONS (CIVIL)

1. THIS TRIAL IS EXPECTED TO LAST FOR _____ DAYS. AT LEAST THAT'S WHAT THE ATTORNEYS TELL ME. REMEMBER, THERE IS NO TIME LIMIT ON THE AMOUNT OF TIME THAT ANY PARTICULAR JURY MAY DELIBERATE. IS THERE ANY JUROR WHO CANNOT BE HERE FOR THE ANTICIPATED DURATION OF THE TRIAL? (**EXPLAIN HARDSHIP**)
2. IS THERE ANYTHING ABOUT THE NATURE OF THIS CASE THAT WOULD CAUSE ANY PROSPECTIVE JUROR TO START INTO THE TRIAL WITH ANY BIAS OR PREJUDICE, EITHER ONE WAY OR ANOTHER?
3. IS THERE ANY HEALTH ISSUE, PHYSICAL PROBLEMS OR PERSISTENT PHYSICAL AGGRAVATION OR OTHER PROBLEM THAT WOULD MAKE IT DIFFICULT FOR YOU TO SIT AS A JUROR? (BAD BACK, MIGRAINES, ETC).
4. THE COURT PREVIOUSLY INTRODUCED THE PLAINTIFF AND THE PLAINTIFF'S ATTORNEY. DOES ANYONE KNOW THE PLAINTIFF OR HIS ATTORNEY? DOES ANYONE KNOW ANYONE ASSOCIATED WITH THE LAW FIRM OF _____ ?
5. THE COURT PREVIOUSLY IDENTIFIED THE DEFENDANTS AND THEIR ATTORNEY. DOES ANYONE KNOW THE DEFENDANTS OR THEIR LAWYER IN THIS CASE? DOES ANYONE KNOW ANYONE ASSOCIATED WITH THE LAW FIRM OF _____ ?

6. HAVE ANY OF YOU HEARD OR READ ANYTHING ABOUT THIS CASE?
7. I WILL NOW ASK COUNSEL FOR THE PLAINTIFF TO LIST ALL OF THE WITNESSES THAT HE EXPECTS MIGHT BE CALLED TO TESTIFY.
 - (A) PLEASE RAISE YOUR HAND IF YOU BELIEVE THAT YOU KNOW ANY OF THESE WITNESSES. (PLAINTIFF'S COUNSEL READS NAMES.)
8. I WILL NOW ASK COUNSEL FOR THE DEFENDANTS TO LIST ALL OF THE WITNESSES THAT THEY EXPECT TO TESTIFY.
 - (A) PLEASE RAISE YOUR HAND IF YOU BELIEVE THAT YOU KNOW ANY OF THESE WITNESSES. (DEFENSE COUNSEL READS NAMES.)
9. DO ANY OF YOU KNOW ANYONE WHO WORKS IN THE LEGAL SYSTEM: JUDGE, LAWYER, CLERK, PROBATION OFFICER, PARALEGAL, ETC?
10. DO YOU HAVE ANY TRAINING OR WORK EXPERIENCE IN THE FIELD OF LAW?
11. HAVE YOU SERVED AS A JUROR IN A CRIMINAL OR A CIVIL CASE OR AS A MEMBER OF A GRAND JURY IN EITHER A FEDERAL OR STATE COURT?
 - (A) HAVE YOU EVER SERVED AS THE FOREPERSON?
12. HAVE YOU EVER TESTIFIED BEFORE IN ANY COURT PROCEEDING? (NOT A DEPOSITION.)
13. DOES ANYONE KNOW ANY OF THE OTHER JURORS FROM ANY CONTACT OTHER THAN YOUR MEETING THIS MORNING?

14. HAVE YOU, YOUR CLOSE FRIENDS OR RELATIVES, EVER BEEN A LITIGANT/PARTY IN A COURT HEARING OR PROCEEDING?
15. DO ANY OF YOU HAVE ANY MORAL, RELIGIOUS, OR PHILOSOPHICAL BELIEFS THAT WOULD PREVENT YOU FROM FULFILLING YOUR DUTIES AND RESPONSIBILITIES AS A JUROR?
16. AS A JUROR IN THIS CASE, YOUR OBLIGATION WOULD BE TO LISTEN TO THE EVIDENCE AND FROM THAT DETERMINE THE FACTS ACCORDING TO THE LAW AS GIVEN TO YOU BY THE COURT. YOU MUST FOLLOW THE COURT'S INSTRUCTIONS ON THE LAW EVEN IF YOU DISAGREE WITH THEM. IS THERE ANYONE WHO WOULD BE UNABLE OR UNWILLING TO FOLLOW THE COURT'S INSTRUCTIONS EVEN IF YOU THOUGHT THE LAW WAS UNWISE OR WRONG?
17. CAN YOU THINK OF ANY REASON THAT WOULD PREVENT YOU FROM BEING ABLE TO RENDER A FAIR AND IMPARTIAL VERDICT IN THIS CASE?
18. IF YOU WERE THE PLAINTIFF / DEFENDANT, WOULD YOU WANT A JUROR WITH YOUR PRESENT STATE OF MIND SITTING ON THE JURY?
19. DOES ANY JUROR BELIEVE THAT HE OR SHE HAS STRONG FEELINGS, EITHER POSITIVE OR NEGATIVE, REGARDING OUR SYSTEM OF COMPENSATING INDIVIDUALS WITH MONEY DAMAGES FOR INJURIES?
20. DO ANY OF YOU HAVE ANY BELIEF OR FEELING TOWARD ANY OF THE PARTIES, ATTORNEYS OR WITNESSES THAT MIGHT BE REGARDED AS A BIAS OR PREJUDICE FOR OR AGAINST ANY OF THEM?

21. IS THERE ANYTHING IN YOUR BACKGROUND OR LIFE EXPERIENCE THAT YOU FEEL THE COURT AND COUNSEL SHOULD KNOW ABOUT OR THAT WOULD MAKE YOU UNCOMFORTABLE SERVING AS A JUROR IN THIS KIND OF CASE?

THANK YOU LADIES AND GENTLEMEN. I WILL NOW PERMIT THE LAWYERS TO HAVE _____ **MINUTES** PER SIDE TO ASK ADDITIONAL VOIR DIRE QUESTIONS.